IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

AMAZON.COM, INC. and AMAZON DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR COMMERCIAL PARTNERS; BRIAN WATSON; STERLING NCP FF, LLC; MANASSAS NCP FF, LLC; NSIPI ADMINISTRATIVE MANAGER; NOVA WPC LLC; WHITE PEAKS CAPITAL LLC; VILLANOVA TRUST; CASEY KIRSCHNER; ALLCORE DEVELOPMENT LLC; FINBRIT HOLDINGS LLC; CHESHIRE VENTURES LLC; CARLETON NELSON; JOHN DOES 1-20,

Defendants.

CASE NO. 1:20-CV-484-LO-TCB

NOTICE OF HEARING AND PARTIAL WAIVER OF ORAL ARGUMENT ON PLAINTIFFS' MOTION TO HOLD DEFENDANTS BRIAN WATSON & WDC HOLDINGS LLC IN CIVIL CONTEMPT

PLEASE TAKE NOTICE that, pursuant to Local Civil Rule 7(E), Plaintiffs hereby waive oral argument on the immediate relief requested in their Motion To Hold Defendants Brian Watson & WDC Holdings LLC In Civil Contempt, namely: an order that preserves the *status quo* until full hearing and resolution of the motion by relying on the current record and September 10, 2021, Rule 37 ruling to hold that Defendants are prohibited from engaging in personal or business transactions in excess of \$10,000, and from initiating or settling any collateral asset litigation, until the Court hears and fully resolves this motion, including any appointment of a receiver. In the event the Court wishes to hear from the parties, or Defendants request a hearing on the foregoing

interim relief, Plaintiffs will make themselves available at the Court's convenience on Friday, October 1.

PLEASE TAKE FURTHER NOTICE that, on October 8, 2021, at 10:00 a.m., or as soon thereafter as the matter may be heard, counsel for Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc. will present argument before this Court on the remaining relief addressed in their Motion To Hold Defendants Brian Watson & WDC Holdings LLC In Civil Contempt.

Dated: September 30, 2021 Respectfully submitted,

s/ Michael R. Dziuban

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Counsel for Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system. I will then send the document and a notification of such filing (NEF) to the following parties via U.S. mail to their last-known address and by email, where noted:

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<u>s/ Michael R. Dziuban</u>

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